

1 Gregg S. Kleiner, State Bar No. 141311  
2 RINCON LAW LLP  
268 Bush Street, Suite 3335  
3 San Francisco, CA 94104  
3 Telephone No.: 415-672-5991  
4 Facsimile No.: 415-680-1712  
4 Email: gkleiner@rinconlawllp.com

5 Counsel for FRED HJELMESET,  
6 Trustee in Bankruptcy

7  
8 UNITED STATES BANKRUPTCY COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

11 In re  
12 EVANDER FRANK KANE,  
13 Debtor.

Case No. 21-50028 SLJ  
Chapter 7  
Hon. Stephen L. Johnson

14 **STIPULATION TO ENTRY OF ORDER  
EXTENDING DATE FOR FILING  
COMPLAINT  
(11 U.S.C. SECTION 727)**

15 [No Hearing Requested]

16  
17  
18 This stipulation is entered into by and between Evander Frank Kane (“Debtor”) and Fred  
19 Hjelmeset, Trustee in Bankruptcy of the Debtor’s estate (“Trustee”), through their respective  
20 counsel.

21 **RECITALS**

22 A. On January 9, 2021, the Debtor filed a Voluntary Chapter 7 Petition.

23 B. On January 11, 2021, the Bankruptcy Court issued its “Notice of Chapter 7  
24 Bankruptcy Case,” Docket 4 (“Notice”).

25 C. The Notice provides that the deadline for filing complaints against the Debtor for  
26 non-dischargeability or denial of discharge is April 5, 2021.

27 **STIPULATION**

28 NOW, THEREFORE, the parties agree as follows:

1       1.       With regard to any complaints that would have to be filed by the Trustee in  
2 conformity with Bankruptcy Code Section 727 (11 U.S.C. § 727) and Rule 4004 of the Federal  
3 Rules of Bankruptcy Procedure (i.e., discharge of debt) shall be extended for approximately 30 days  
4 from the current deadline of April 5, 2021 through and including May 5, 2021.

5           2.       The parties further agree that the new deadline, May 5, 2021, may be further extended  
6 by stipulation of the parties.

7 3. The parties agree to entry of an order in the form annexed hereto as **Exhibit A**.

DATED: March 22, 2021 RINCON LAW LLP

## RINCON LAW LLP

By: /s/ Gregg S. Kleiner

GREGG S. KLEINER

Counsel for FRED HJELMESET,  
Trustee in Bankruptcy

DATED: March 22, 2021 FINESTONE HAYES LLP

FINESTONE HAYES LLP

By: *Stephen D. Finestone*

STEPHEN D. FINESTONE

Counsel for Debtor, EVANDER FRANK KANE

1 Gregg S. Kleiner (SBN 141311)  
2 RINCON LAW LLP  
268 Bush Street, Suite 3335  
3 San Francisco, CA 94104  
3 Tel. 415-672-5991  
4 Fax. 415-680-1712  
4 [gkleiner@rinconlawllp.com](mailto:gkleiner@rinconlawllp.com)

5 Counsel for FRED HJELMESET,  
6 Trustee in Bankruptcy

7  
8 UNITED STATES BANKRUPTCY COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

In re	Case No. 21-50028 SLJ
EVANDER FRANK KANE,	Chapter 7
Debtor.	Hon. Stephen L. Johnson
	<b>ORDER EXTENDING DATE FOR FILING COMPLAINT OBJECTING TO DISCHARGE (11 U.S.C. SECTION 727)</b>

16  
17 Based on the Stipulation to Entry of Order Extending Date for Filing Complaint (11 U.S.C.  
18 Section 727) (the “Stipulation”) entered into by and between Fred Hjelmeset, Trustee in Bankruptcy  
19 of the Debtor’s estate and Debtor Evander Frank Kane, through their respective counsel,  
20 electronically filed on March 22, 2021, as Docket No. \_\_\_\_\_,

21 IT IS HEREBY ORDERED, as follows:

22 1. The Stipulation is approved.  
23 2. With regard to the Trustee, the current deadline established by Rule 4004 of the  
24 Federal Rules of Bankruptcy Procedure to object to the Debtor’s discharge is hereby extended  
25 through and including May 5, 2021.

26 **\*\*\*END OF ORDER\*\*\***

27  
28

**EXHIBIT A**

1                   \*\*\* ***COURT SERVICE LIST*** \*\*\*

2   No Court service required.

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**EXHIBIT A**